1 2 3 4 5 6 IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF WASHINGTON 7 AT SEATTLE 8 No. 2:20-cv-01076-RSL THE DENTISTS INSURANCE COMPANY, 9 STIPULATION AND ORDER TO Plaintiff. **EXTEND DISCOVERY CUTOFF BY 60** 10 **DAYS** v. 11 JOSEPH Z. YOUSEFIAN, DMD, MS and JOSEPH Z. YOUSEFIAN, D.M.D., M.S., 12 INC., P.S., doing business as Yousefian Orthodontics, 13 Defendants. 14 15 Plaintiff The Dentists Insurance Company (TDIC) and Defendants Joseph Z. Yousefian, 16 DMD, MS and Joseph Z. Yousefian, D.M.D., M.S., INC., P.S., doing business as Yousefian 17 Orthodontics (together, "Yousefian") (collectively, the "Parties") hereby submit the following 18 Stipulation to Extend the Discovery Cutoff by 60 days: 19 I. **STIPULATION** 20 Throughout the course of this litigation, the parties have diligently worked to complete 21 all discovery by the August 7, 2022 discovery cutoff set by this Court in Dkt. 46. However, due 22 to COVID-19 and other scheduling issues, as well as Plaintiff's inadvertent failure to produce a 23 number of documents in response to Defendants' Requests for Production, the Parties have been

Case 2:20-cv-01076-RSL Document 83 Filed 08/04/22 Page 2 of 3

1 unable to complete discovery in this matter. The parties have also been focused on efforts to 2 engage in settlement discussions and have therefore avoided certain discovery expenses in order 3 to facilitate those discussions. As a result, the Parties respectfully request that the August 7, 2022 discovery cutoff set 4 by this Court in Dkt. 46 be extended by 60 days. All other pending deadlines shall remain the 5 6 same. Good cause exists to extend the discovery cutoff by 60 days. The Parties propose a new 7 discovery cutoff of October 6, 2022. 8 DATED this 3rd day of August, 2022. 9 LETHER LAW GROUP 10 <u>/s/ Eric J. Neal</u> Eric J. Neal, WSBA #31863 11 /s/ Kasie Kashimoto Kasie Kashimoto, WSBA #54268 12 1848 Westlake Avenue N, Suite 100 Seattle, WA 98109 13 P: (206) 467-5444/F: (206) 467-5544 eneal@letherlaw.com 14 kkashimoto@letherlaw.com Attorney for Plaintiff The Dentists Insurance 15 Company 16 GORDON TILDEN THOMAS & CORDELL LLP 17 /s/ Michael P. Brown Michael P. Brown, WSBA #45618 18 600 University Street, Suite 2915 Seattle, Washington 98101 19 P: 206.467.6477 mbrown@gordontilden.com 20 Counsel for Defendants 21

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1	II. ORDER
2	It is so ordered.
3	Dated this 4th day of August, 2022.
4	MMS Casnik
5	Robert S. Lasnik United States District Judge
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7	Presented By:
8	LETHER LAW GROUP
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